REMARKS

This Amendment is being filed in response to the Office Action
mailed December 24, 2008, which has been reviewed and carefully
considered. Reconsideration and allowance of the present
application in view of the amendments made above and the remarks to
follow are respectfully requested.

Claims 1-31 are pending in the application, where claims 30-31
had been previously added. Claims 1 and 22 are independent.

In the Office Action, claims 1, 18-19 and 21 are rejected
under 35 U.S.C. §102(e) over U.S. Patent No. 7,027,881 (Yumato).
Further, claims 2-17, 20 and 22-29 are rejected under 35 U.S.C.
§103(a) over Yumato in view of U.S. Patent Application Publication
No. 2002/0154161 (Friedman). It is respectfully submitted that
claims 1-31 are patentable over Yumato and Friedman for at least
the following reasons.

Yumato is directed to a remote control system which is
constructed from a simple device configuration. ABILITY
information indicating the ability of an input operation function
of a control device is transmitted from the control device to the

device to be controlled. The **device to be controlled creates**

conversion-into-remote-controller data on the basis of this ability

information and transmits the data to the control device. Then,

the control device creates a GUI by using the received conversion-

into-remote-controller data. As a result, the control device can

function as a remote controller which remotely controls a specific

device to be controlled. Thus, it is the **device to be controlled**

that creates conversion-data based on the ability of the control

device, and then the control device creates a GUI based on the

conversion-data created by the **device to be controlled**. Yumato is

completely silent about any synonyms.

Friedman is directed to creating a universal console (UC)

200platform for a UC device. As described in paragraph [0027], the

UC 200 communicates with client devices 110a-110e via a network 14.

Servers 10a-10b are also connected to the network 14, where one

server 10b is connected to a database 20 that stores canonical user

interface descriptions.

Paragraph [0029], beginning on line 4 of Friedman,

specifically recites:

the user sets up or initializes the UC 200

by describing his or her preferences and disabilities. The UC 200 digests and stores this user information. Later, as the user encounters various devices or applications to be controlled, such as devices 110a, 110b, 110c, 110d, 110e, etc. and applications 135a, 135b, 135c, etc. of FIG. 1, and indicates a desire to control a particular device or application, **the device** or application **to be controlled** **sends** a canonical user interface (UI) description of its UI to the UC 200. The canonical UI description may also come from another source. The canonical UI description adheres to an abstract format to describe in high-level terms the functionality of the device's UI. (Emphasis added)

Paragraph [0030] of Friedman further specifically recites that:

From the canonical UI representation, the UC device 200 is capable of recognizing both the action-commands. (Emphasis added)

Thus, any universal remote control user interface in Friedman is created by the UC 200 using canonical UI representation received **from the device to be controlled**.

It is respectfully submitted that Yumato, Friedman, and combination thereof, do not teach or suggest the present invention as recited in independent claim 1, and similarly recited in independent claim 22 which, amongst other patentable elements, recites (illustrative emphasis provided):

mapping the RUI to the CUI **by the control
device by replacing** the **RUI with a synonym** that
matches the RUI, the synonym being included in a
synonym database; and
displaying by the control device at least a
part of the **CUI that includes the synonym instead
of the RUI** as a user interface to the network
device, wherein the CUI is more consistent with
user interfaces of further network devices so
that the control device presents a user the user
interface that includes the CUI for controlling
the network device and the further devices.

These features are nowhere disclosed or suggested in Yumato,

Friedman, and combination thereof. Even, assuming arguendo, that

the canonical UI representation is Friedman are analogous to the

synonym, as recited in independent claim 1 and 22, such a 'synonym'

in Friedman is provided to the UC 200 by the device to be

controlled. Thus, at best, the UC 200 creates a user interface

from information provided **by the device to be controlled**.

There is simply no disclosure or suggestion in Yumato,

Friedman, and combination thereof, of mapping the RUI to the CUI **by

the control device** by replacing the RUI with a synonym that matches

the RUI," as recited in independent claim 1, and similarly recited

in independent claim 22. (Illustrative emphasis provided) The

Friedman UC 200 does not replace anything, but simply uses the

canonical UI representation provided by the device to be controlled, where such canonical UI representation is basically the UI of the device to be controlled. Thus, the Friedman UC 200 merely uses the 'RUI' provided by the device to be controlled, without any replacement of anything.

Accordingly, it is respectfully submitted that independent claims 1 and 22 are allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-21 and 23-31 should also be allowed at least based on their dependence from independent claims 1 and 22.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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